

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

NOTICE OF DOCUMENT DISCREPANCIES

08 JUL -8 PM 12:28

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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
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TO: U. S. DISTRICT JUDGE / U. S. MAGISTRATE JUDGE M. James Lorenz
 FROM: E. Lloyd, Deputy Clerk RECEIVED DATE: Clerk 7/7/08

CASE NO.: 08cv969-L (POR) DOCUMENT FILED BY: Paradise Hills Convalescent

CASE TITLE: Collier et al v. Paradise Hills Convalescent Center et al

DOCUMENT ENTITLED: Defendant Paradise Hills Convalescent Center's Joinder in Notice of Removal

Upon the submission of the attached document(s), the following discrepancies are noted:

<input checked="" type="checkbox"/> Local Rule	Discrepancy
<input type="checkbox"/> 5.1	Missing time and date on motion and/or supporting documentation
<input type="checkbox"/> 5.3	Document illegible or submitted on thermal facsimile paper
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<input type="checkbox"/> 7.1 or 47.1	Date noticed for hearing not in compliance with rules/Document(s) are not timely
<input type="checkbox"/> 7.1 or 47.1	Lacking memorandum of points and authorities in support as a separate document
<input type="checkbox"/> 7.1 or 47.1	Briefs or memoranda exceed length restrictions
<input type="checkbox"/> 7.1	Missing table of contents
<input type="checkbox"/> 15.1	Amended pleading not complete in itself
<input type="checkbox"/> 30.1	Depositions not accepted absent a court order
<input type="checkbox"/>	Supplemental documents require court order
<input type="checkbox"/>	Default Judgment in sum certain includes calculated interest
X	<u>OTHER:Case closed</u>

Date forwarded: 7/7/08ORDER OF THE JUDGE / MAGISTRATE JUDGE**IT IS HEREBY ORDERED:**

The document is to be filed nunc pro tunc to date received.

The document is NOT to be filed, but instead REJECTED. and it is ORDERED that the Clerk serve a copy of this order on all parties.

Rejected document to be returned to pro se or inmate? Yes. Court Copy retained by chambers

Counsel is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83.1

CHAMBERS OF: M. JAMES LORENZDated: 7/7/08

cc: All Parties

By: M. James Lorenz

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12 PARADISE HILLS CONVALESCENT CENTER

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

1
2 FRANZISKA I. COLLIER, individually and as)
3 Administrator of the Estate of Edgar T. Collier,)
4 Deceased; KEA JADE COLLIER, a Minor, by)
5 her Guardian Ad Litem MICHAEL HYDE,

6 Plaintiffs,

7 vs.

8 PARADISE HILLS CONVALESCENT)
9 CENTER, a business entity, form unknown;)
10 DR. GAYNSKI; DR. C. ARAMBULO;)
11 KAISER FOUNDATION HOSPITALS;)
12 SOUTHERN CALIFORNIA PERMANENTE)
13 MEDICAL GROUP; KAISER FOUNDATION)
14 HEALTH PLAN, INC.; and DOES 1 through)
15 100, inclusive,

16 Defendants,

17 Civil Action No.: 08 CV 0969 L POR

18 San Diego Superior Court Case No:
19 No: 37-2007-00075145-CU-MM-CTL
20 Assigned to Department: C-66
21 Hon.: Charles R. Hayes

22 DEFENDANT PARADISE HILLS
23 CONVALESCENT CENTER'S
24 JOINDER IN DEFENDANTS
25 CELESTINE ARAMBULO, D.O., KAISER
26 FOUNDATION HOSPITALS, SOUTHERN
27 CALIFORNIA PERMANENTE MEDICAL
28 GROUP, AND KAISER FOUNDATION
HEALTH PLAN, INC.'S NOTICE OF
REMOVAL

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1 filed by co-defendants CELESTINE ARAMBULO, D.O., KAISER FOUNDATION
2 HOSPITALS, SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, and
3 KAISER FOUNDATION HEALTH PLAN, INC., on or about May 30, 2008.

4

5

6 Dated: June 23, 2008

BEACH | WHITMAN | COWDREY, LLP

7 By:

8 Thomas E. Beach
9 Janet G. Martin
10 Attorneys for Defendant,
11 PARADISE HILLS CONVALESCENT CENTER

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BEACH | WHITMAN | COWDREY, LLP
760 PASEO CAMARILLO, SUITE 550
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TELEPHONE: (805) 388-3100

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF VENTURA

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action. My business address is 760 Paseo Camarillo, Suite 350, Camarillo, California 93010.

On June 23, 2008, I served the foregoing document(s) described as: **DEFENDANT PARADISE HILLS CONVALESCENT CENTER JOINDER IN DEFENDANTS CELESTINE ARAMBULO, D.O., KAISER FOUNDATION HOSPITALS, SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, AND KAISER FOUNDATION HEALTH PLAN, INC.'S NOTICE OF REMOVAL** on the interested parties in this action, by placing the original a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

(BY FIRST CLASS MAIL) I caused such envelope with postage thereon fully prepared to be placed in the United States mail at Camarillo, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

____ (BY FACSIMILE TRANSMISSION) On this date, I transmitted from a facsimile transmission machine in Camarillo, California, whose telephone number is (805) 388-3414 the above-named document was transmitted to the interested parties herein whose facsimile transmission telephone numbers are included in the attached Service List. The above-described transmission was reported as complete without error by a transmission report issued by the facsimile transmission machine upon which the said transmission was made immediately following the transmission. A true and correct copy of the said transmission report is attached hereto and incorporated herein by this reference.

(BY OVERNIGHT CARRIER) I placed the above-named document in an envelope or package designated by [GoldenState Overnight Carrier/UPS/Federal Express/Overnite Express] ("express service carrier") addressed to the parties listed on the service list herein, and caused such envelope with delivery fees paid or provided for to be deposited in a box maintained by the express service carrier. I am "readily familiar" with the firm's practice of collection and processing of correspondence and other documents for delivery by the express service carrier. It is deposited in a box maintained by the express service carrier on that same day in the ordinary course of business.

(BY PERSONAL SERVICE) I delivered such envelope by hand to the office of the addressee.

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 23, 2008, at Camarillo, California.

Tina L. Amoke

1 **SERVICE LIST**

2 **COLLIER v. PARADISE, SDSC CASE NO. 37-2007-00075145-CU-MM-CTL**

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